

UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF NEW YORK

Chapter 11

Case No. 22-10943(MEW)

In re:

Judge Wiles

Voyager Digital Holdings, INC., et al.,

Debtors

**MOTION TO COMPEL THE DEBTORS TO FILE A STATEMENT OF FINANCIAL
AFFAIRS**

COMES NOW, Alah Shehadeh Pro Se creditor, in the above-captioned bankruptcy case, and respectfully moves this Honorable Court to order the debtors, Voyager Digital Holdings Inc, et al., to comply with their statutory obligation to file a statement of financial affairs, as required by 11 U.S.C. § 521(a)(1)(B)(iv) of the United States Bankruptcy Code.

The debtors have failed to comply with the court's deadline to file the required statement of financial affairs, despite being ordered to do so and having sufficient time to comply. The statement of financial affairs is a crucial document in the bankruptcy process, as it provides a comprehensive overview of the debtors' financial history and transactions, which is essential for the trustee to administer the estate and for creditors to receive proper notice of the bankruptcy case.

As the Supreme Court stated in *Grogan v. Garner*, 498 U.S. 279 (1991), the Bankruptcy Code requires full and complete disclosure of a debtor's financial affairs in order to preserve the integrity of the bankruptcy process and to ensure that creditors receive fair treatment. The Court has the power to enforce this requirement under 11 U.S.C. § 105(a), which provides the court

with the authority to "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title."

The debtors' failure to file a statement of financial affairs violates the Bankruptcy Code and the principles of fairness and transparency in the bankruptcy process. Therefore, the Court should grant this motion and order the debtors to immediately file a statement of financial affairs in accordance with 11 U.S.C. § 521(a)(1)(B)(iv) and applicable case law.

Respectfully submitted,

/s/ Alah Shehadeh.

Dated: 02/01/2023

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